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ATTORNEYS FOR  
DEFENDANT NETFLIX, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BROADCOM CORPORATION *et al.*,

Plaintiffs,

v.

NETFLIX, INC.,

Defendant.

Case No. 3:20-cv-04677-JD

**JOINT STIPULATION TO EXTEND  
DEADLINE TO FILE OMNIBUS  
SEALING MOTION AND ~~[PROPOSED]~~  
ORDER**

Judge: Honorable James Donato

Date Filed: March 13, 2020

Trial Date: February 12, 2024

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Broadcom Corporation and Avago Technologies International Sales PTE. Limited (“Plaintiffs”) and Defendant Netflix, Inc. (“Netflix”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and request as follows:

**SHOWING OF GOOD CAUSE**

WHEREAS, in accordance with the Stipulation of the Parties and the Court’s Standing Order for Civil Cases, the Court Ordered a modified sealing procedure for the parties’ dispositive and *Daubert* motions and related documents (Dkt. 477);

WHEREAS, under the modified procedures, the Parties are to file an Omnibus Sealing Motion by September 29, 2023, with supporting declarations from the Parties and any third parties’ whose confidential information is sought to be sealed;

WHEREAS, the Parties provided prompt notice to potentially impacted third parties and have been working diligently to collect the supporting documentation;

WHEREAS, despite their diligence, the Parties would benefit from an extension of the deadline to collect and present the supporting documentation, and in fact, certain of the impacted third parties have expressly requested additional time to complete and provide supporting declarations for the Omnibus Sealing Motion;

WHEREAS, on September 27, 2023, the Parties met and conferred telephonically and agreed that an extension of the submission deadline for the Omnibus Sealing Motion would allow for them and the third parties to complete, collect, and provide supporting declarations to more fully explain the bases for the requested sealing;

WHEREAS, the Parties request that the deadline for filing the Omnibus Sealing Motion be extended by two weeks, from September 29, 2023, until October 13, 2023;

WHEREAS, the Court’s Scheduling Order will remain unchanged.

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: October 2, 2023

  
\_\_\_\_\_  
HONORABLE JAMES DONATO  
UNITED STATES DISTRICT JUDGE

KEKER, VAN NEST & PETERS LLP

/s/ Richard L. Wynne, Jr.

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/s/ Katie Lynn Joyce

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**ATTESTATION**

In accordance with Civil Local Rule 5-1(h)(3), I attest that each of the signatories have  
concurred in the filing of this document.

Dated: September 27, 2023

By: /s/ Richard L. Wynne, Jr.

Richard L. Wynne, Jr.